

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID E. KATES
[Plaintiff]

V.

ROBERT PACKER, et al
[defendants]

Civil # 3:13-cv-13-1525

(Caputo, J)

(Saporito, M.J.)

FILED
SCRANTON

JAN 12 2017

PER 
DEPUTY CLERK

MOTION FOR Deposition Upon Written
Questions

Comes Now plaintiff in pro-se capacity with his motion for deposition upon written questions pursuant to F.R.Civ.P. rule 31. The Gist and Contention is as follows.

- 1.) Plaintiff request the court to issue an order allowing plaintiff to depose the following defendants with written questions pursuant to F.R.Civ.P. rule 31 due to him being incarcerated, indigent and unable to conduct a normal deposition like the defendants counsel.
- 2.) Plaintiff request the court to set up a date for plaintiff to submit his questions to defendants R. Packer, Lt. C. Brandt, J. Stroud, G. Wise, and J. Wagner.
- 3.) These written depositions are relevant to plaintiff litigation and the defendants

will be able to explain their positions under oath of what actually happen on 5-24-12.

- 4) Defendants counsel have been evasive in the discovery process and plaintiff pending motion to compel only verify and justify this request.

Respectfully Submitted, David E. Kates

1-8-17

DAVID E. KATES - Pro Se

F.C.I. 4200

P.O. BOX - 5888

Yazoo City MS

39194